IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,	)	
	)	Crim. No. 4:13-CR-00147
v.	)	
	)	
MO HAILONG, and	)	
MO YUN	)	
Defendants.	)	

AGREED PRETRIAL DEADLINES

The government and defendants stipulate and request that the court order the following deadlines in this matter.

Event	**Date**
Rule 16 materials and reciprocal discovery	January 31 (with supplemental disclosures as material becomes available)
Returns on third party subpoenas[1]	February 13
Pretrial motions	March 27[2]
Pretrial motion responses	April 27
Pretrial motion replies	May 11

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[1] The parties will agree to give notice to each other of subpoenas served on third parties and to produce to each other documents obtained from subpoenas served on third parties (including subpoenas served by the government to date).

[2] For good cause shown (including subsequent disclosures in discovery by either side) additional motions may be filed after March 27, with resistances as provided under the Local Rules absent an agreement or court order otherwise.

Government's response to motion to compel FISA materials	90 days after filing of motion to suppress evidence obtained through FISA
Government's expert disclosures	May 1
Defense expert disclosures	July 1
Government's rebuttal expert disclosures	August 1
Giglio and § 3500 materials	August 3 (with supplemental disclosures as material becomes available)
404(b) evidence	August 3
Witness and exhibit lists for both parties Jury Instructions Voir Dire Motions in Limine	August 17 (subject to reasonable revisions as the parties prepare for trial)

The government and defendant Mo Yun disagree as to the proposed pretrial motions schedule. The parties will submit separate filings explaining their positions with respect to those deadlines and that portion of the stipulated schedule.

With respect to defendant Mo Hailong's motion to compel, which defendant Mo Yun has joined, both defendants agree to suspend the government's obligation to resist the motion to compel until the defendants have had an opportunity to review the discovery production the government will make on January 31. After defendants review those materials, they will let the government know if there are additional issues relating to the motion to compel that must be litigated, and, if necessary, the parties will confer and propose a new resistance date to the Court.

There is one exception to this agreement relating to Mo Hailong's motion to compel: defendants require the government to respond to a portion of paragraph 1(h) of Mo Hailong's motion. Specifically, defendants request that the government identify all documents and information obtained through means to which some measure of secrecy or classification is attached, such that defendants would not be, in the government's view, entitled to complete access to the legal authority and facts supporting the search. This includes but is not limited to identification of all information seized pursuant to FISA. The parties agree to extend the government's deadline to respond to this request to January 16, 2015.

Respectfully Submitted,

Nicholas A. Klinefeldt
United States Attorney

By: */s/ Marc Krickbaum*

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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2015, I electronically filed the foregoing with the Clerk of Court using the CM ECF system. I hereby certify that a copy of this document was served on the parties or attorneys of record and the United States Probation Officer by:

____ U.S. Mail ____ Fax ____ Hand Delivery

_X_ ECF/Electronic filing ___ Other means (email)

UNITED STATES ATTORNEY

By: *__/s/ Marc Krickbaum__*
Assistant United States Attorney